

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	)	Chapter 11
	)	
INTERBANK FUNDING CORP., <u>et al.</u> ,	)	Case No. 02-41590 (BRL)
	)	(Jointly Administered)
Debtors.	)	
	)	
IBF FUND LIQUIDATING LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Adv. No. 07-01482 (BRL)
CHADMOORE WIRELESS GROUP, INC.,	)	
CHADMOORE SHAREHOLDER LIQUIDATING	)	
TRUST, ROBERT MOORE and STEPHEN RADUSCH,	)	
	)	
Defendants.	)	

**CROSS-APPELLANT'S COUNTER-DESIGNATION OF ITEMS TO BE INCLUDED  
IN THE RECORD ON APPEAL AND STATEMENT OF ISSUES ON APPEAL**

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure, IBF Fund Liquidating LLC (“Fund LLC”), counter-designates the following items to be included in the record on appeal with respect to the Notice of Cross-Appeal entered on October 19, 2007 [Docket No. 192], in the above-captioned adversary proceeding:

Filing Date	Docket No.	Docket Text
02/14/2007	3	Summons with Notice of Pre-Trial Conference issued by Clerk's Office with Pre-Trial Conference set for 4/5/2007 at 10:00 AM at Courtroom 623 (BRL), Answer due by 3/16/2007, (Leggett, Venice) (Entered: 02/14/2007)
05/11/2007	61	Transcript <i>Of Hearing Held On April 23, 2007, Re: Motion For Preliminary Injunction; Stephen Radusch's And Robert Moore's Motion To Dismiss</i> (related)

		document(s)26, 29) filed by Veritext, LLC. (Braithwaite, Kenishia) (Entered: 05/15/2007)
06/20/2007	113	Transcript <i>Of Hearing Held On May 24, 2007, Re: Preliminary Injunction</i> filed by Veritext, LLC. (Braithwaite, Kenishia) (Entered: 06/26/2007)

Additionally, the transcripts not presently docketed for the hearings held before the Bankruptcy Court on: (i) August 6, 2007; (ii) September 18, 2007; and (iii) October 2, 2007, should be included in the record on appeal and are being requested concurrently with the filing of this counter-designation.

**Statement of Issues on Cross-Appeal**

1. Whether the Bankruptcy Court erred in granting summary judgment in favor of Robert Moore (“Moore”) on Fund LLC’s alternative theory under Count VI of the Complaint that Moore was personally liable to Fund LLC under the Colorado personal liability statute, C.R.S. § 7-102-104 (2006).

Dated: New York, New York  
November 26, 2007

IBF Fund Liquidating LLC

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